

Defendant.

**STIPULATION FOR  
PROTECTIVE ORDER**

3. Access to Protected Documents by defendant will be restricted to personnel authorized by the Court, namely defendant, attorneys of record and attorneys, paralegals, investigators, experts,

1 and secretaries employed by the attorneys of record and performing services on behalf of defendant.  
2 As such, the following restrictions will be placed on defendant, defendant's attorney and the above-  
3 designated individuals unless and until further ordered by the Court. Defendant, defendant's attorney  
4 and the above-designated individuals shall not:

- 5 a. make copies for, or allow copies of any kind to be made by any other person  
6 of Protected Documents, or allow the Protected Documents to be otherwise disseminated;  
7 b. allow any other person to read Protected Documents; and  
8 c. use Protected Documents for any other purpose other than preparing to defend  
9 against the charges in the Indictment or any further superseding indictment arising out of this case.  
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11 4. Defendant shall not retain any copies of the Protected Documents. If defendant creates  
12 any notes that contain any personal identifiers received from the Protected Documents, then  
13 defendant's attorney shall retain such notes for defendant.

14 5. Defendant's attorney shall inform any person to whom disclosure may be made  
15 pursuant to this order of the existence and terms of this Court's order.

16 6. The requested restrictions shall not restrict the use or introduction as evidence of  
17 discovery documents containing personal identifying information such as social security numbers,  
18 drivers license numbers, dates of birth, and addresses during the trial of this matter.

19 7. Upon conclusion of this litigation, defendant's attorney shall return to counsel for the  
20 United States, or destroy and certify to counsel for the United States, the destruction of all  
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1 discovery documents containing personal identifying information such as social security numbers,  
2 drivers license numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty  
3 days after defendant has exhausted all appellate rights or rights under 18 U.S.C. 2255.

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5 DANIEL BOGDEN  
United States Attorney

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7  For:  
8 MICHAEL CHU  
Assistant U.S. Attorney

DATE

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10   
11 JONATHAN POWELL, Esq.  
Counsel for defendant

DATE

4-25-13

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12  
13 **ORDER**

14 IT IS SO ORDERED this 6th day of May, 2013

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17 UNITED STATES MAGISTRATE JUDGE  
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